UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 2**

DATE:

SUBJECT:

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

SECTION 313 REGULATORY COMPLIANCE INSPECTION

Honig Chemical & Processing Corp.

414 Wilson Ave.

Newark, New Jersey 07105

Inspection date: April 9, 2015

FROM:

Ronald Wienckoski

Toxics Program Specialist

Senior Service America, Inc.

Toxics Section

William Molnar

Toxics Program Specialist Senior Service America, Inc.

Toxics Section

Date:

Date:

THRU:

Mary Ann Kowalski, M. P. H

R2 TRI Enforcement Coordinator

Pesticides & Toxic Substances Branch

Toxics Section

Basald Wunchoppi

TO:

Susan Schulz, Chief

Pesticides & Toxic Substances Branch

Toxics Section

FACILITY INFORMATION I.

COMPANY NAME:

Honig Chemical & Processing Corp

414 Wilson Ave

Newark, New Jersey 07105

TELEPHONE NUMBER

TYPE OF FACILITY

TRI FACILITY ID:

FRS NUMBER: NAICS CODE:

(973) 344-0600

Manufacturing

07105HNGCH414WI

110001134601

325199 (All other Basic Organic Chemical Mfg.)

DUN & BRADSTREET NUMBER

05-509-0106 New Jersey

STATE OF INCORPORATION:

NUMBER OF EMPLOYEES:

38

GROSS ANNUAL SALES:

\$2.1M

II. INSPECTION

DATE OF NOTIFICATION: DATE OF INSPECTION:

April 2, 2014 April 9, 2014

TIME OF INSPECTION:

10:00 AM

TYPE OF INSPECTION CONDUCTED:

EPCRA 313, Neutral Scheme

RESPONSIBLE OFFICIAL:

David Honig, President

COMPANY PARTICIPANTS:

Joseph Rotunno, Director of Operations

U.S. EPA, REGION 2 (Division of Enforcement & Compliance Assistance, Pesticides & Toxic Substances,

Ronald Wienckoski, Toxics Program Specialist, Assisting the Environmental Protection Agency under a Cooperative Agreement with Senior Service

America (SSAI)

Toxics Section)

William Molnar, Toxics Program Specialist, Assisting the Environmental Protection Agency under a Cooperative Agreement with Senior Service

America (SSAI)

III. OBJECTIVES

On October 16, 2014, an EPCRA Section 313 neutral scheme inspection was conducted at Honig Chemical Processing Corp. located at 414 Wilson Ave, Newark, New Jersey to determine regulatory compliance with the Emergency Planning and Community Right-to-Know Act. (40 C.F.R. Part 372). Honig was selected for an inspection because it was part of the "Making a Visible Difference in Communities Initiative" and it has a NAICS code that appears on the list of facilities that must report if it meets the reporting requirements. Arrangements for this inspection were made with Joseph Rotunno, Director of Operations on April 6, 2014 by telephone. A confirmation e-mail and questionnaire were sent to Rotunno on that same day.

IV. DESCRIPTION OF COMPANY

Honig Chemical & Processing Corp. (Honig) has been at this site since 1975. It is incorporated in the State of New Jersey. Their D & B Number is 05-509-0161. The company President is David Honig. The 50,000 square foot facility is privately owned. In 1978 Robert Honig formed another corporation in partnership with Julian Bauer and Arnold Stern called Jarchem Inc., which markets the products produced by Honig. They currently have 38 employees; 21 work in the manufacturing division and 17 work in the marketing division. The production division operates 3 shifts/day, 24 hours/day, 5 days/week. Sales operates 1 shift, 5 days.

V. INSPECTION SUMMARY

A. OPENING CONFERENCE

Upon arrival, Mr. Wienckoski introduced himself and William Molnar. After presenting our

EPA identification, explaining our status with the EPA and the purpose of our visit, we issued a Notice of Inspection to Mr. Rotunno. He was then asked to read and sign The Notice of Inspection (Attachment 1). He signed the form and retained a copy for company records. He was also informed that we may require photocopies of specific documents during the course of the inspection which would be listed on The Receipt for Samples and Documents.

B. EPCRA SECTION 313

We reviewed the answers to the completed questionnaire that was sent to the facility prior to the inspection (Attachment 2).

Honig manufactures acetate salts specifically sodium acetate, potassium and sodium di-acetate used in the food and pharmaceutical industries. The raw materials used in the preparation of these salts include acetic acid, potassium hydroxide, sodium hydroxide, glycolic acid and benzoic acid. None of these chemicals are on the Toxic Release Inventory. The facility also repackages anhydrous salts, natural oils and butters

A typical salt such as sodium acetate would be prepared by the neutralization reaction of sodium hydroxide with acetic acid in a reaction vessel. The resulting product is then dried in filter presses and/or rotary dryers. The finished product is then tested and packaged. The wastewater is pumped into an aboveground storage tank where the pH is adjusted and discharged to the industrial sewer. All off-spec product is recycled.

Rotunno stated that Honig does not generate hazardous waste from the manufacturing process. He added that in 2014 expired raw materials were identified in the warehouse and shipped offsite as hazardous waste by Republic Env. Systems (Attachment 3). Their non-hazardous waste is handled by Waste Recovery Solutions (Attachment 4). They have a New Jersey air quality Permit GP-108 (Attachment 5).

The only TRI chemicals listed in the Community Right To Know Documents were Sodium Nitrite and Hydrochloric Acid (Attachment 6). Mr. Rotunno said they no longer use those chemicals (Attachment 7).

Mr. Rotunno said the most recent Form R that he could find was for the reporting year 1997. The TRI chemical reported was Captan, CAS # 133-06-2 (Attachment 8). They no longer use this chemical.

VI. CLOSING CONFERENCE

After the walkthrough we returned to the conference room. There were no other questions. Rotunno then signed the Receipt for Samples and Documents and retained a copy for company files (Attachment 9).

VII. FINDINGS AND CONCLUSIONS

Based on examination of the documentation received and requested during the inspection of the facility, it appears that they did not process any TRI chemicals for the years 2011, 2012 and 2013.

VIII. ATTACHMENTS

- 1. Notice of Inspection
- 2. Inspection Questionnaire
- 3. Hazardous Waste Manifest
- 4. Non-Hazardous Waste Manifest
- 5. Air Permit
- 6. Community Right To Know Surveys for 2011, 2012 and 2013
- 7. Chemical Non Use Document
- 8. Form R Report
- 9. Receipt for Samples and Documents